

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

LORI ANN MORRIS, }  
Plaintiff, }  
vs. }  
FLORIDA TRANSFORMER, EDWARD }  
NEAL THOMPSON, et al., }  
Defendants. }

CIVIL ACTION NO.

3:05cv962-T

**INTERROGATORIES**

COMES NOW the defendant designated in plaintiff's Complaint as Florida Transformer, Inc., and pursuant to Rule 36, *Alabama Rules of Civil Procedure*, hereby requests the plaintiff to admit the truth of the following:

**INSTRUCTIONS AND DEFINITIONS**

These interrogatories are continuing, and to the extent that the answers may be enlarged, diminished, or otherwise modified by information acquired by plaintiffs subsequent to the service and filing of answers hereto, plaintiffs are requested to serve promptly thereafter and to file supplemental answers reflecting such changes.

**DEFINITIONS**

1. When used in reference to an individual person, "identify" or Identity" means to state his or her full name and present or last known address and telephone number, and contemporaneous or last known position and business affiliation at the time in question. When used in reference to a business organization or entity other than an individual, "identify" or "identity" means to state its full name, its principal business

address, and the nature of the organization (e.g., corporation, partnership). When used in reference to a document, "identify" or "identity" means to set forth its date, author, designated and actual recipient(s), type of document, number of pages and identity (as defined above) of its present or last known custodian.

2. The term "incident" shall mean the alleged incident which is involved in this action.

3. The term "related", "relating" and "in relation to" shall mean referring to, or having any relationship with whatsoever, or regarding or pertaining to, or comprising, or indicating or constituting evidence or, in whole or in part.

4. The term "document" shall mean letters, correspondence, memoranda, notes, work papers, charts, reports, ledgers, drawings, plans, specifications, contracts or photographs, and shall include but shall not be limited to, any written, printed, typed or other graphic matter of any kind or nature, all mechanical, magnetic, and electronic sound recordings or transcripts thereof, all microfilm, microfiche, or other reproductions, and all data, information or statistics contained within any data storage modules, tapes, discs or other memory devices (including IBM, punched or similar cards for information, data and programs), or other information retrieval storage systems (included computer-generated reports and printouts) in the possession and/or control of your and/or your counsel or agents, or known by you to exist. It shall also mean all drafts and/or copies of documents by whatever means made.

5. As used herein, the singular shall always include the plural, and the present tense shall always include the past tense.

6. As used herein, "and" as well as "or" shall be construed both disjunctively and conjunctively in order to bring within the scope of these interrogatories all responses which might otherwise be construed to be outside their scope.

7. As used herein, "you" and "your" shall mean all plaintiffs.

**INTERROGATORIES**

1. Please identify each and every "state and federal regulation" that you contend that defendant Florida Transformer, Inc. or defendant Edward Neal Thompson violated in connection with the automobile accident that serves as the basis of this lawsuit.

2. If you deny any of the Requests for Admissions, please state the reason for such denial including, but not limited to, any state or federal regulations you claim that Florida Transformer, Inc. or Edward Neal Thompson violated.



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**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the foregoing document on the following by placing a copy in the United States mail, postage prepaid and properly addressed to them on this the 8 day of October, 2005.



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OF COUNSEL

CC:

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